

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

| | | |
|-------------------------------------|---|-------------------------------------|
| Michael Gene Putnam, |) | |
| |) | C.A. No. _____ |
| Plaintiff, |) | |
| |) | |
| vs. |) | DEFENDANTS' ANSWERS TO LOCAL |
| |) | RULE 26.01 INTERROGATORIES |
| Wake Christian Academy, Dana Lynn |) | |
| Cordell, Kellie O'Neal Auerweck and |) | |
| Robin Cary Maples, |) | |
| |) | |
| Defendants. |) | |

Wake Christian Academy, Dana Lynn Cordell, Kellie O'Neal Auerweck and Robin Cary Maples, by and through their undersigned counsel, respond as follows to the Court's Local Civil Rule 26.01 Interrogatories.

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER:

Not applicable.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER:

Plaintiff has requested a jury trial.

State whether the party submitting these responses is a publicly owned company and separately identify:

- (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock;
- (2) each publicly-owned company which it is a parent; and

- (3) each publicly-owned company of which the party owns ten percent (10%) or more of the outstanding shares.

ANSWER:

Not applicable.

(C) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See* Local Civ. Rule 3.01 (D.S.C.).

ANSWER:

The basis for removal to this division is diversity jurisdiction. (28 USC § 1332(a); 28 USC § 1441; 28 USC § 1367.)

(D) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide:

- (1) a short caption and the full case number of the related action;
- (2) an explanation of how the matters are related; and
- (3) a statement of the status of the related action.

Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER:

None.

(E) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER:

Not applicable.

(F) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER:

Not applicable.

Respectfully submitted,

HALLIGAN MAHONEY WILLIAMS SMITH
FAWLEY & REAGLE, PA

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Attorney for Defendants Wake Christian Academy,
Dana Lynn Cordell, and Kellie O'Neal Auerweck

July 30, 2019
Columbia, South Carolina

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

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|-------------------------------------|---|---------------------------------------|
| Michael Gene Putnam, |) | |
| |) | C.A. No. _____ |
| Plaintiff, |) | |
| |) | |
| vs. |) | CERTIFICATE OF SERVICE BY MAIL |
| |) | |
| Wake Christian Academy, Dana Lynn |) | |
| Cordell, Kellie O'Neal Auerweck and |) | |
| Robin Cary Maples, |) | |
| |) | |
| Defendants. |) | |

CERTIFICATE OF SERVICE BY MAIL

The undersigned of Halligan Mahoney & Williams, PA, hereby certifies that he has served the following PRO SE Plaintiff with the foregoing Notice of Removal by mailing a copy of same as certified mail, postage prepaid and return address clearly indicated, to the following on this 30th day of July, 2019:

Michael Gene Putnam
101 Reedy View Drive #263
Greenville, South Carolina 29601

Chace Campbell
ChaceLaw Limited Company
12 East Stone Avenue
Greenville, SC 29609

s/Thomas K. Barlow